

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: ALEX W. YANCEY,	{	CHAPTER 13
	{	
	{	
DEBTOR(S)	{	CASE NO. A15-53615-BEM
	{	
	{	JUDGE ELLIS-MONRO

OBJECTION TO CONFIRMATION

COMES NOW Mary Ida Townson, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payment under the proposed plan are not current.

2. The Debtor(s) has failed to provide the Trustee with a copy of the federal tax return or transcript of such return for the most recent tax year ending immediately before the commencement of the instant case and for which a federal income tax return was filed, in violation of 11 U.S.C. Section 521(e)(2)(A)(i).

3. Tax escrow slips have not been submitted, to reflect a tax withholding obligation of \$345.00 per month; thereby, failing to substantiate the funding of post-petition obligations, 11 U.S.C. Section 1325(a)(6).

4. Pursuant to information received from the Meeting of Creditors, 2013-2014 tax return(s) have not been provided to the taxing authorities; thereby, preventing the Chapter 13 Trustee from evaluating the feasibility of the Chapter 13 plan, in violation of 11 U.S.C. Section 1322(d) and 1325(a)(6).

5. The Debtor(s) has failed to provide adequate notice to Universal Truck Load, Internal Revenue Service and Georgia Department of Revenue, in violation of 11 U.S.C. Section 342.

Mary Ida Townson, Chapter 13 Trustee
Suite 2200
191 Peachtree Street, N.E.
Atlanta, GA 30303-1740
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WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny confirmation of this Debtor's(s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

April 8, 2015

/s
Sonya M. Buckley, Esq.
for Chapter 13 Trustee
GA Bar No. 140987

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CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR(S):

ALEX W. YANCEY
501 RIVER WALK
DOUGLASVILLE, GA 30134

ATTORNEY FOR DEBTOR(S):

CLARK & WASHINGTON
3300 NE EXPRESSWAY BLDG 3
ATLANTA, GA 30341

in the above in the foregoing matter with a copy of this pleading
by depositing same in the United States Mail in a properly
addressed envelope with adequate postage thereon.

This 8th day of April, 2015

_____/s_____
Sonya M. Buckley, Esq.
for Chapter 13 Trustee
GA Bar No. 140987

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